



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, ILLINOIS 60604**

DATE: JUN 29 2015

SUBJECT: CLEAN AIR ACT INSPECTION REPORT
Paragon Metal Fabricators, Cincinnati, Ohio

FROM: Shilpa Patel, Environmental Engineer
AECAB (MN/OH)

THRU: Brian Dickens, Section Chief
AECAB (MN/OH)

TO: File

BASIC INFORMATION

Facility Name: Paragon Metal Fabricators

Facility Location: 4317 Kugler Mill Road, Cincinnati OH 45236

Date of Inspection: June 4, 2015

Lead Inspector: Shilpa Patel

Other Attendees:

1. Chad McEvoy, US EPA, Environmental Scientist
2. Kurt Smith, Southwest Ohio Air Quality Agency
3. Stan Muehlenkamp, Paragon

Purpose of Inspection: Region 5 received a complaint regarding this company; inspectors visited the site while in the area performing other inspections.

Facility Type: Paragon is a metal welding job shop

Arrival Time: 1:30 pm

Departure Time: 3:15 pm

Inspection Type:

- ☒ Unannounced Inspection
- ☐ Announced Inspection

OPENING CONFERENCE

- ☒ Credentials Presented
- ☒ CBI warning to facility provided

The following information was obtained verbally from Stan Muehlenkamp unless otherwise noted.

Process Description:

Paragon Metal Fabricators (Paragon) is a metal job shop that has been in business for 26 years. Their primary customer is Siemens. They run two shifts, Monday through Friday. Paragon cuts sheets of metal and welds the pieces into housings/shells for electric components. They work with carbon steel mostly, but also with stainless steel and aluminum. The company uses a laser cutter and a water propelled sand cutter to cut the sheets in a shapes that are then welded together in one of 10 welding booths to create a structure. The shapes can be rolled or bent if needed. The structures are then either further cut, grinded, or primed as needed. The company has a paint booth where it primes a portion of its finished product.

Staff Interview: The laser cutter was installed on April 20, 2015.

TOUR INFORMATION

EPA toured the facility: Yes

Data Collected and Observations:

Stan Muehlenkamp led a tour of the company. EPA observed a wash booth and a paint booth upon entering the plant floor. Mr. Muehlenkamp explained that the welded structures are first washed and then primed. The paint booth has a filter and is vented through the side of the building. The paint booth uses a Speedaire Pressure Feed- Conventional Spray Gun. EPA observed no signs of fugitive material on building or ground around the vent. The company uses xylene to clean the paint gun and lines. EPA next saw the welders, a saw mill, several grinders, a drill; none of these areas have emission controls. Stan showed the inspectors the company's water jet sand cutter and new laser cutter (which was installed within the last few weeks). The sand cutter uses water (90,000 psi) to propel sand to cut metal sheets. The sand is broken during the process and cannot be reused. The new laser cutter is used to cut metal sheets, and debris from the process is sent through another vent. EPA checked this unit's vent (opposite side of building from paint booth's vent) and saw no fugitive material on the building or around the vent.

Field Measurements: were not taken during this inspection.

RECORDS REVIEW

- Reviewed MSDS sheets for paints and cleaners used, obtained copies

CLOSING CONFERENCE

Requested documents:

- Requested information on wire used during welding

Compliance Assistance: EPA emailed a copy of the NESHAP Subpart XXXXXX rule to the facility after the inspection concluded.

Concerns: Facility is potentially subject to air regulations and does not currently have an air permit. Additionally, xylene is being used to clean spray/paint equipment.

SIGNATURES

Lead Inspector: Shyza Patel Date: 6/29/15

Section Chief: John D. [Signature] for B. Dickens Date: 6/29/15